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June 18, 2020

VIA ECF

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***Giuffre v. Dershowitz***, Case No. 19-Civ-3377-LAP

Dear Judge Preska,

Plaintiff asserts in her letter [ECF No. 141] that Defendant in his pre-motion conference letter filed in *Giuffre v. Dershowitz* [ECF No. 133] and concurrently filed in *Giuffre v. Maxwell* [ECF No. 1058-1], improperly referenced the contents of sealed material. This assertion completely lacks basis, and amounts to nothing more than an *ad hominem* attack on opposing counsel.

The gratuitous nature of this assertion is evinced by the fact that Plaintiff fails to identify the purported sealed materials that Defendant allegedly disclosed in his letter with specificity – because there are none. References made to the allegations made by the Plaintiff, and the issues as to her credibility, are readily available in pleadings, discovery, and first and foremost, in the public domain. Defendant simply seeks to advance discovery in this action expeditiously, with efficiency, and without the distraction of needless contention between counsel.

Lastly, at this stage, Plaintiff's request to brief this motion under seal is premature. We do not anticipate that Defendant's motion will require sealing. However, we will confer with Plaintiff's counsel to assess whether they have legitimate concerns that would merit this approach.

Respectfully Submitted,


Imran H. Ansari


Arthur L. Aidala

CC: All Counsel of Record (via ECF)